

EXHIBIT A

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

BILLY EVANS AND HEATHER EVANS
INDIVIDUALLY AND AS NATURAL
GUARDIANS OF OMARION EVANS
OMARION EVANS, an infant
9235 Waterman
Angola, NY 14006

Plaintiffs,

vs

SOUTHTOWNS CATHOLIC SCHOOL
2052 Lakeview Road
Lakeview, NY 14085

JAMISON LI VECCHI, an infant
BY MICHAEL LI VECCHI AND CLARA LI VECCHI,
HIS PARENTS AND NATURAL GUARDIANS
5390 Old Lakeshore Road
Lakeview, NY 14085

Defendants.

**AMENDED
VERIFIED COMPLAINT**

Index No: 2019/801322

Plaintiffs, as in for their complaint against the Defendants states as follows:

1. That at all times hereinafter mentioned, Plaintiffs were residents of the Town of Hamburg, County of Erie and State of New York.

2. That the Defendants, SOUTHTOWNS CATHOLIC SCHOOL, upon information and belief, is an entity doing business in the Town of Hamburg, Country of Erie and State of New York.

3. Upon information and belief, the Defendant, JAMISON, is and was a student at SOUTHTOWNS CATHOLIC SCHOOL at all time herein after mentioned.

4. That the Plaintiff, infant OMARION, was a student of the SOUTHTOWNS CATHOLIC SCHOOL in December, 2018 and prior thereto.

5. Upon information and belief, the Defendant, JAMISON, was a student

at SOUTHTOWNS CATHOLIC SCHOOL in December of 2018 and prior thereto.

6. That, upon information and belief, the officials at SOUTHTOWNS CATHOLIC SCHOOLS directed JAMISON to escort students at the SOUTHTOWNS CATHOLIC SCHOOL to the bathroom in December 2018 and prior thereto.

7. That, upon information and belief, the officials at SOUTHTOWNS CATHOLIC SCHOOLS knew or should have known that the infant Defendant, JAMISON, was sexually abusing the students at the SOUTHTOWNS CATHOLIC SCHOOL when he escorted them to the bathroom.

8. That, specifically, the infant JAMISON fondled the penis of infant OMARION EVANS on numerous occasions when he escorted the infant OMARION to the bathroom.

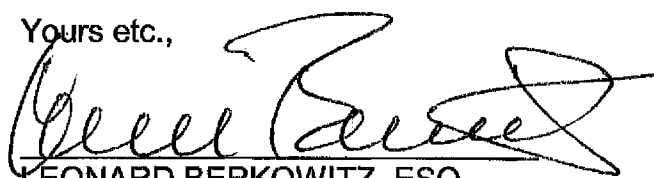
9. That the Defendant, SOUTHTOWNS CATHOLIC SCHOOL was responsible for the safety of the infant OMARION while at the SOUTHTOWNS CATHOLIC SCHOOL and they failed in their duty to insure his safety by exposing him to the infant, JAMISON who sexually abused him on a regular basis in December of 2018 and prior thereto.

10. That as a result of the negligence of the SOUTHTOWNS CATHOLIC SCHOOL and the acts of the Defendant JAMISON, the Plaintiff OMARION has been psychologically damaged and has suffered psychological injuries as a result of the negligence of the Defendant, SOUTHTOWNS CATHOLIC SCHOOL and the acts of the Defendant, JAMISON.

WHEREFORE, Plaintiffs seek damages against the Defendants for injuries suffered by the infant OMARION and for such other and further relief as to this Court seems just and proper including the costs and disbursements of this action.

DATED: Orchard Park, New York
~~January 24, 2019~~
May 9

Yours etc.,



LEONARD BERKOWITZ, ESQ.

Attorney for Plaintiff

4513 S Buffalo Street

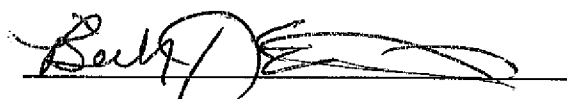
PO Box 639

Orchard Park, New York 14127

(716) 662-9808

VERIFICATION

I, BILLY EVANS, being duly sworn, deposes and says that deponent is the Plaintiff herein, has read the attached Amended Complaint, and knows the contents thereof: that the same is true to deponent's own knowledge, except as to those matters deponent believes it to be true.


BILLY EVANS

Sworn to me this 15 day
of May, 2019

Barbara Collins
Notary Public

BARBARA M. COLLINS
Notary Public, State of New York
Qualified in Erie County
My Commission Expires May 15, 2022

I, HEATHER EVANS, being duly sworn, deposes and says that deponent is the Plaintiff herein, has read the attached Amended Complaint, and knows the contents thereof: that the same is true to deponent's own knowledge, except as to those matters deponent believes it to be true.


HEATHER EVANS

Sworn to me this 14 day
of May, 2019

Barbara Collins
Notary Public

BARBARA M. COLLINS
Notary Public, State of New York
Qualified in Erie County
My Commission Expires May 15, 2022
Case 1:20-cv-01016-CLB Doc 303-1 Filed 11/21/23, Entered 11/21/23 16:07:11,
Description: Exhibit A-4 of 4 Verified Complaint, Page 5 of 5